## REMARKS

Applicants request favorable reconsideration and allowance of the present application in view of the foregoing amendments and the following remarks.

Claims 1, 3, 4, 7, 9-12, 27-29, 31-33, 38, and 42-57 are pending in this application, with Claims 1, 27-29, 31, 38, 42, 46, 48, 51, and 54-57 being independent. By this Amendment, Applicants have amended Claims 1, 27-29, 31, 32, 38, 42, 46, 48, 51, and 54-57. Applicants submit that no new matter has been added.

Claims 1, 3, 4, 7, 9-12, 22, 27-29, 31, 38 and 42-56 have been rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,029,182 (Nehab et al.) in view of U.S. Patent No. 6,012,083 (Savitzky et al.). Claims 32-33 have been rejected under 35 U.S.C. § 103(a) as being obvious over Nehab et al. in view of Savitzky et al., and further in view of U. S. Patent No. 5,633,996 (Hayashi et al.). These rejections are respectfully traversed. Also, Applicants note that Claim 22 has previously been canceled.

Independent Claim 1 is generally directed to a method, operable in a first application upon a local machine, of forming a single continuous printable document by collating a plurality of hyper-text documents. As amended, independent Claim 1 recites a step of monitoring access patterns of a second application to the plurality of hyper-text documents, wherein the second application operates on the local machine independently of the operation of first application, with access to the hyper-text documents occurring independently of the first application. The monitoring identifies the plurality of hyper-text documents accessed independently by the second application.

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The other independent claims recite features generally similar to those discussed above with respect to independent Claim 1, inasmuch as the claims have been amended to further clarify the independent operation of the first and second applications (or the like).

In rejecting independent Claim 1, as well as the other independent claims, based on the combination of Nehab, et al. and Savitsky, et al., the Office Action acknowledges that Nehab, et al. fails to disclose the monitoring function. Instead, it is the position set forth in the Office Action that Savitsky, et al. describes an independent agency program which provides a history of all the documents accessed by a client. Further, the Office Action alleges that it would have been obvious for a person of ordinary skill in the art to incorporate the agency program of Savitsky, et al. into the system described in Nehab, et al. to arrive at a system similar to that of the present invention (in which the first and second applications operate independently of each other). For the reasons discussed below, Applicants respectfully disagree with position set forth in the Office Action.

With the previous Amendment in the present application, filed on December 27, 2004, Applicants provided Attachment A, including Figures A, B, E, and F. Those figures illustrate embodiments corresponding to the present invention and the above-discussed patents. Applicants again refer to those figures inasmuch as the present claim amendments clarify and build on the differences between the present application and the cited art discussed in that previous Amendment and illustrated in the figures of Attachment A.

As previously discussed, Figure A is one example of the monitoring performed by the present invention, as represented by the unidirectional line from the browser (second application) to the first application. As that figure illustrates, the operation of the second application is independent of the operation of the first application. The operations of Nehab, et al. and Savitsky, et al. are shown in Figures B and E, respectively. As can be seen, in those arrangements bidirectional communication is required with respect to a second application in order to implement web browsing. Furthermore, Figure F shows a combination of the agency program of Savitsky, et al. and the system described in Nehab, et al. Again, bidirectional communication occurs between the first and second applications, even with the illustrated combination.

The independent claims of the present application distinguish themselves from these references because there is monitoring of a second application operating independently of a first application on a local machine.

The basis of the outstanding rejection requires that the agency program of Savitsky, et al. be incorporated into the system of Nehab, et al. in order to achieve the "monitoring" of the present invention. However, in any practical implementation of the agency program of Savitsky, et al., the program conveys the "www" request commands and replies to and from the browser. It logically follows that the browser (e.g., second application) does not operate independently of the agency program with such conveyances. More specifically, in order to perform the monitoring, the browser would need to conduct operations dependent upon commands being conveyed through the agency program and data being returned from the web via the agency program.

In the present invention, the access by the second application to various web pages from which the hyper-text documents are sourced is expressly performed independent of the monitoring. The agency program of <u>Savitsky, et al.</u> fails to meet these criteria. In particular, the system of <u>Savitsky, et al.</u> operates by interpreting the browser commands and then passing those browser commands from the client to the server, as well as operating in a similar fashion with the return data. Thus, even when combined with <u>Nehab, et al.</u> independent operation would not be achieved.

In addition to the combination proposed in the Office Action not providing the patentable aspects of the present invention, Applicants also submit that the proposed combination is not proper. In order to achieve the proposed combination, the system in <u>Nehab, et al.</u> would be forced to communicate with the agency program of <u>Savitsky, et al.</u> The Examiner has not identified any motivation to cause <u>Nehab, et al.</u> to work in this manner. In particular, <u>Nehab, et al.</u> is, on its own, able to access the web and create its own record of locations under user control, without any need for an intervening agency program. Thus, there would be no need to provide such an agency program to the system described in <u>Nehab, et al.</u>

In addition, as discussed, even if one did position the agency program between the system of <u>Nehab, et al.</u> and the web, the dependence avoided by the present invention would still exist. Even if the modification forces the program of <u>Nehab, et al.</u> to communicate with the agency program instead of with the web, the agency program creates a log file, as discussed in <u>Savitsky et al.</u> Creation of the log file would cause the agency program to pas commands to and from the web, ultimately compelling dependence of the

browser upon the agency program. Thus, the independent operation would still not be achieved. There is no suggestion in either combined documents as to why the agency program would suddenly cease to act dependently upon the browser and achieve the independent operation of the present invention.

Because such motivation to combine is lacking, and even if one of ordinary skill in the art were to combine the agency program of Savitsky, et al. with the disclosure of Nehab, et al., the combined operation would still not achieve the independent operation of the first and second applications generally recited in the independent claims of the present application, Applicants submit the rejections are improper.

The Hayashi, et al. patent was cited for each teaching of "maximizing the number of hyper-text documents on each page ...."; however, Applicants submit the Hayashi, et al. patent fails to remedy the deficiencies noted above with respect to Nehab, et al. and Savitsky, et al.
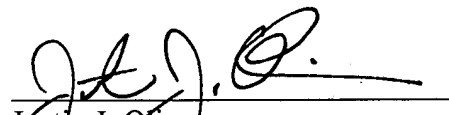
Therefore, Applicants submit that none of the cited patents, whether taken alone or in combination, suggests the features of independent Claim 1, and in particular, monitoring access patterns of a second application independently of operations of the first application. Applicants submit that the other independent claims are variously directed to methods, computer implemented methods, computer systems, computer readable medium, computer program products, and computer apparatuses, each of which recites patentable features along the lines of those discussed above with respect to independent Claim 1. Of course, the language specifically recited from claim to claim varies and Applicants submit that each independent claim should be considered on its own merit.

The remaining claims each depend from one of the independent claims discussed above. Applicants submit that these claims are patentable over the documents of record for reasons noted above with respect to the independent claims from which they depend, and for reciting features of the invention still further distinguishing over the applied documents.

For the foregoing reasons, Applicants request withdrawal of the rejections under § 103.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to the below-listed address.

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